

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

	X	
	:	
In re:	:	
	:	
THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. ¹	:	
	X	

**STATEMENT OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS
IN RESPONSE TO MOTION BY AMERICAN FEDERATION OF STATE, COUNTY
AND MUNICIPAL EMPLOYEES, AFL-CIO (AFSCME) TO
COMPEL COMPLIANCE WITH AUGUST 10, 2017 STIPULATION AND ORDER**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all title III Debtors (other than COFINA) (the “Committee”), as the “Commonwealth Agent” with respect to the “Commonwealth-COFINA Dispute,” as defined in the Stipulation and Order Approving Procedure to Resolve Commonwealth-COFINA Dispute [Docket No. 996] (the “Commonwealth-COFINA Dispute Stipulation”), hereby submits this statement in response to the *Motion by the American Federation of State, County and Municipal Employees, AFL-CIO*

¹ The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474).

(AFSCME) to Compel Compliance with the August 10, 2017 Stipulation and Order [Docket No. 3092] (the “Motion”), and respectfully states as follows:

STATEMENT

The Commonwealth Agent is not the target of the Motion. If anything, the Commonwealth Agent is the party that may have been bypassed by certain negotiations between the GO Creditor Representative and certain other parties, and the Commonwealth Agent reserves its right to respond at the appropriate time to any position taken or disclosure made by any party with respect to such matters (including with respect to any violations of the confidentiality provisions in the mediation agreement related to this court’s *Order Appointing Mediation Team* [Docket No. 430]). Moreover, the Commonwealth Agent has always been in compliance, and will remain in compliance, with the terms of the Commonwealth-COFINA Dispute Stipulation, and it has been negotiating, and is continuing to negotiate, with the COFINA Agent with respect to the Commonwealth-COFINA Dispute. The Commonwealth Agent does not believe that any additional response to the Motion is required at this time.

[Remainder of page intentionally left blank.]

Dated: May 24, 2018

/s/ G. Alexander Bongartz

PAUL HASTINGS LLP
Luc. A. Despina, Esq. (*Pro Hac Vice*)
James R. Bliss, Esq. (*Pro Hac Vice*)
James B. Worthington, Esq. (*Pro Hac Vice*)
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
lucdespina@paulhastings.com
jamesbliss@paulhastings.com
jamesworthington@paulhastings.com
alex bongartz@paulhastings.com

Counsel to the Official Committee of Unsecured Creditors

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC
Juan J. Casillas Ayala, Esq., USDC - PR 218312
Diana M. Batlle-Barasorda, Esq., USDC - PR 213103
Alberto J. E. Añeses Negrón, Esq., USDC - PR 302710
Ericka C. Montull-Novoa, Esq., USDC - PR 230601
El Caribe Office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901-2419
Telephone: (787) 523-3434
jcasillas@cstlawpr.com
dbatlle@cstlawpr.com
aaneses@cstlawpr.com
emontull@cstlawpr.com

Local Counsel to the Official Committee of Unsecured Creditors